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Docket Management Facility  
US Department of Transportation  
400 Seventh Street, SW  
Nassif Building, Room PL-401  
Washington, DC 20590-001

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RE: Docket Number (FAA-2003-14830  
RIN 2120-AH02

FAA-2003-14830-10

Dear Sirs:

I am writing this letter in regards to the SFAR 71 in the State of Hawaii. I have been flying helicopters as a professional commercial pilot in Hawaii since 1988, before SFAR 71 was implemented. I have many concerns with the safety of flying under SFAR 71.

Prior to SFAR 71 at no time did I ever consider or think the flying to be unsafe. Flying tours over most islands in Hawaii can be accomplished without flying over any homes, buildings or congested areas, so requiring me to fly at 1500 feet above ground level in these areas of Raw Terrain has forced me into airspace with fixed wing traffic (which I am supposed to avoid the flow of) which at many times has created the real possibility of near miss situations. I believe that eliminating the altitude restrictions in these areas would greatly increase the safety aspect of flying helicopters in Hawaii. Including the always-present noise issue that helicopters generate.

Lower altitude flying for helicopters has always been standard operating procedure for noise and safety.

There are many beautiful valleys in Hawaii in which I flew safely into and out of for many years, with the altitude restriction of SFAR 71 from vertical raw terrain has forced me to fly down the center of the valley into sometimes severe unseen turbulence instead of where I used to fly in smooth, calm air next to the valley walls. The 1500-foot altitude restriction has forced me into controlled airspace for cloud clearance, which in the state of Hawaii at times can be very restrictive and what I can consider to be unsafe with some fixed wing traffic cruising through the area unannounced and not talking on the radio. Eliminating the altitude restriction would also eliminate the possibility of flying anytime into inadvertent IMC conditions. I have been forced a lot of times off shore over water to comply with SFAR 71 altitude restrictions, which could result in having to make a water landing instead of the safe environment I had to leave upslope, with many suitable landing areas and great visibility at lower altitudes.

Some of the requirements that were put into place with SFAR 71 I feel were very good, the floatation gear requirements for flying in our environment was great, very well thought out Performance planning before a flight has always been standard operating procedure for all helicopter pilots.

I now have a total of 16,250 hours of flying and in my qualified and professional opinion I believe that for safety of commerce certain aspects of SFAR 71 have to be eliminated.

Please consider my request and let me go back to a safer flying environment.

Sincerely,

*Patrick F. Boyle*  
Patrick F. Boyle